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**BEFORE THE PUBLIC UTILITIES COMMISSION  
OF THE STATE OF CALIFORNIA**

*Order Instituting Rulemaking Regarding  
Broadband Infrastructure Deployment and  
to Support Service Providers in the state of  
California.*

Rulemaking 20-09-001  
(Filed 08/06/01)

**OPENING COMMENTS OF THE COACHELLA VALLEY ASSOCIATION  
OF GOVERNMENTS PERTAINING TO MIDDLE MILE LOCATIONS**

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**BEFORE THE PUBLIC UTILITIES COMMISSION  
OF THE STATE OF CALIFORNIA**

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**I. INTRODUCTION**

The Coachella Valley Association of Governments (CVAG), a governmental agency organized pursuant to the California Joint Power Act (Cal. Govt. Code § 6500 *et seq.*), respectfully submits these comments (“Opening Comments”) on the Order Instituting Rulemaking Regarding Broadband Infrastructure Deployment and to Support Service Providers in the state of California (R2009001) (the “Order”).

CVAG is a regional planning agency coordinating government services in the Coachella valley. CVAG is governed by leaders of ten city jurisdictions four Tribal nations and the County of Riverside. By providing solutions to the common issues of the local governments and tribes that are its members, CVAG promotes a better quality of life and balanced growth for residents in the Coachella Valley, located in Eastern Riverside County.

As the recognized planning agency with the Riverside County Transportation Commission, CVAG prepares a Regional Transportation Plan for the Coachella Valley. Central to this effort is the Transportation Project Prioritization Study (TPPS), which identifies and prioritizes transportation projects in the region. The projects within the TPPS are fed into a larger

regional planning effort by the Southern California Association of Governments (SCAG). CVAG also manages and distributes funds under the Congestion Management Air Quality program, programs transportation improvement projects, and administrates the region's Transportation Mitigation Fee Program.

Additionally, as a general purpose Council of Governments, CVAG also takes on array of projects to meet the needs of the region. These include, but are not limited to, habitat conservation, Desert Community Energy – a community choice aggregation program, and a regional signal synchronization program.

## **II. IDENTIFYING EXISTING INFRASTRUCTURE**

The Coachella Valley Association of Governments is undertaking a signal synchronization project that will bring about significant improvements to the Coachella Valley's transportation system and that can serve as shovel ready opportunity to install middle-mile infrastructure which will increase broadband access, decrease the digital divide, and in turn increase productivity, commerce and jobs in the Coachella Valley. It can also better serve the area by increasing competition and provide service to areas currently underserved, or lacking, the necessary infrastructure to support high-speed internet. If the middle-mile backbone is installed in conjunction with CVAG's CV Sync Project, significant savings can be achieved while delivering the aforementioned benefits.

The CV Sync Project will improve transportation efficiency and improve coordination among the various jurisdictions using intelligent transportation system technologies. In effect, reducing greenhouse gas emissions and achieving increase efficiency in traveling times. The elements and technical components of the intelligent transportation system rely on a fiber optic network. The CV Sync Project traverses all the cities in the Coachella Valley, from the western-most city, Palm Springs, to the eastern-most City, Coachella. The project includes more than 120 corridors and 550 traffic signals in the Coachella Valley.

The infrastructure supporting the CV Sync Project includes the installation of a 144 strand fiber optic cable. This cable is dedicated to intelligent transportation system communications and smart cities technologies. This fiber cable will be installed throughout a 120 mile network, interconnecting all the cities and tribes throughout the Coachella valley.

This presents a unique opportunity to also install a separate 432 strand fiber optic cable within the same trench/conduit bank that can serve as a middle-mile broadband backbone for the Coachella Valley, interconnecting all valley cities and tribes and providing a network for community anchor institutions.

Using a “dig once” approach, will achieve significant savings in comparison to installing a 432 optic cable as a stand-alone middle-mile project. Given this, thoughtful and serious consideration should be given to the benefits of combining middle-mile investments with CVAG’s CV Sync project, to optimize the available use of funds dedicated to improving access to broadband state-wide.

Currently, the CV Sync project has an approved environmental document and is finalizing Phase II of its design, providing an opportunity for incorporating design elements for middle-mile broadband. CVAG is positioned to finalize Phase II design at the end of 2021 and begin to open bids to advertise construction in January 2022. Hence, creating a shovel ready opportunity to install fiber middle-mile infrastructure throughout the Coachella Valley. Based on a preliminary engineering cost estimate, if a 120-mile dark fiber installation were to occur as a stand-alone project, the cost would be approximately \$50 million. In comparison, if this was incorporated into the CV Sync project, the cost of doing the same work would significantly be reduced to approximately \$20 million – a cost reduction of \$30 million.

As a region, the Coachella Valley can achieve significant environmental, economic and social benefits. The COVID-19 pandemic has really highlighted the disparities between those that have access to, and those that do not have access to, high-speed internet. By improving access, more people can utilize the remote work option, reducing vehicle miles traveled and reducing associated emissions. This also helps decrease the risk and exposure to contracting the COVID-19 virus.

In areas that are underserved, such as in the Eastern Coachella Valley, CVAG’s proposal to install a middle-mile network will serve as a backbone providing access to areas of the eastern Coachella Valley that lack reliable, high-speed service. Increasing broadband access to disadvantaged communities will increase their opportunities for employment and education, positively impacting the local and regional economy.

For areas that are already served, CVAG’s proposal will help better serve them by increasing competition, and affordability to anchor institutions that play a critical role in

maintaining health and safety. These include K-12 institutions, libraries, medical and healthcare facilities, public safety, government and non-government institutions, and higher education institutions. CVAG's proposed middle-mile can help link these institutions to faster and more reliable internet service, improving their service delivery and costs. As a result, optimizing the use of public resources.

### **III. CONCLUSION**

CVAG'S CV Sync project presents an opportunity to achieve the state's goals to increase access to broadband, while addressing historical inequities related to broadband access and achieving positive social and economic results for the state. As various options to bolster broadband access are being considered, CVAG's CV Sync presents a viable option to meet the state's goals while achieving significant savings due to the completed design work for CV Sync. This presents a shovel-ready opportunity to install fiber that will have significant benefits for all the nine cities, four tribes and the County of Riverside, which are served by CVAG.

Dated: September 3, 2021

Respectfully submitted,

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